


IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

Report Of Investigation

Page 1 of 1

INVESTIGATION DATE Current 10-20-82 Last 1-13-82	FROM: IOWA DEPT. OF ENVIRONMENTAL QUALITY (Use Stamp) REGION NO. 1 209 NORTH FRANKLIN MANCHESTER, IOWA 52057 PHONE 319/927 2640
TO: (Facility Name, Location & Address) Polk Burleson, Supt. Engineering & Maintenance Norplex Division UOP Box 445 Postville, Iowa 52162	Persons Contacted (Name & Position) Polk Burleson, Supt., Engineering & Maintenance
RE: (Specify Investigation Purpose Or Cite Rule) Hazardous Waste Inspection IAD-073489288	 R00330136 RCRA RECORDS CENTER

OBSERVATIONS/RECOMMENDATIONS

In response to a work request from DEQ Central Office, I inspected the hazardous waste areas of Norplex Division's plant in Postville, Iowa, on October 20, 1982. Five questions were supplied with the work request. I will attempt to answer them here.

The first asked whether acetone, butyl alcohol, di-n-butyl phthalate, methanol, methyl ethyl ketone and toluene are used in the manufacturing process or are they actually discarded commercial chemical products or off spec products. Polk Burleson informed me that these six are actually used in the manufacturing process.

The second question asked approximately how long it took Norplex to generate 2200 lbs. of hazardous waste. The best estimate was approximately 4 to 5 days under normal operating conditions.

The third question dealt with the length of storage time of drums in the hazardous waste storage area and the date of the last shipment. The last shipment was on October 14, 1982, and there were no drums in the hazardous waste storage area at the time of this inspection.

Question four asked whether or not the waste would be shipped off-site in 90 days or less and for documentation of this. There is no written contract stating that the waste will be shipped off-site in 90 days or less; however, from assurances by Polk Burleson, I am satisfied that the waste will be shipped off-site in 90 days or less.

The fifth question asked for inspection of the drum storage area to insure compliance with all requirements for a generator with short-term storage status. The storage area was constructed to be in compliance with regulations for a storage facility, and it was found to still be able to meet these requirements. No drums were in the storage area so proper drum labeling could not be checked at this time.

CONCLUSION:

No violations of the RCRA regulations were noted during this inspection.

ENV 27
JPS:mc

SUSPENSE DATE 11	Signature <table style="width: 100%;"> <tr> <td style="width: 50%;">Inspector Joe P. Sanfilippo</td> <td style="width: 50%; text-align: center;"><i>Joe P. Sanfilippo</i></td> </tr> <tr> <td style="width: 50%;">Regional Administrator Ron Stellick</td> <td style="width: 50%; text-align: center;"><i>Ron Stellick</i></td> </tr> </table>	Inspector Joe P. Sanfilippo	<i>Joe P. Sanfilippo</i>	Regional Administrator Ron Stellick	<i>Ron Stellick</i>	Date 10/22/82 10-25-82
Inspector Joe P. Sanfilippo	<i>Joe P. Sanfilippo</i>					
Regional Administrator Ron Stellick	<i>Ron Stellick</i>					
Enclosures (Specify)						
Distribution: Regional Office: Central Office: Inspected Facility Date Copy Mailed: 10-25-82 <i>mc</i>						

Norplex Division Inspection

1. Their existing Part A identifies a number of U-series waste streams (acetone, butyl alcohol, Di-n-butyl phthalate, methanol, methyl ethyl ketone, and toluene). Are these wastes actually "discarded commercial chemical products or off-spec products" or are these materials used in the actual manufacturing process? If discarded commercial chemicals products, how are they generated?
2. Approximately how long does it take Norplex to generate 2200 pounds of hazardous waste?
3. Are there any drums in the storage area which have been there for over 90 days? When was the last shipment?
4. Is the hazardous waste going to be shipped off-site in 90 days or less? If yes, please attempt to obtain a copy of a document which will ensure that this will occur (e.g. a contract with the transporter).
5. Inspect the drum storage area in accordance with the generator with short term storage. Are they in compliance with all requirements? If not, explain why not..

Norplex has submitted information (see attached) stating that the storage tank holding phenolic resins is not included in the hazardous waste management system. Do not include the storage tank in your inspection.

Rec'd
3 Nov 1982
from B. Cook

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY
WORK REQUEST

63

Request to: <u>1</u> Region or Section	Location of Task or Facility: <u>NRMPLEX</u>	Requested by: <u>BILLY COOK</u>
Routing: <u>BARB COOK</u>	<u>NRMPLEX DIVISION</u>	Approval: <u>DRP</u> Compliance Division
<u>ROD VIEGER</u>	<u>POSTVILLE</u>	Request Logged: <u>10-4-82</u> (Date)
		Completion Logged: <u>10-29-82</u> (Date)
Needed by: <u>OCTOBER 22, 1982</u>	<u>See - Please check this out</u>	

Description of Task and Reason for Request (attach pertinent documents and route to Compliance Division)
ON MARCH 4, 1982 EPH REQUESTED NRMPLEX'S PART B N.W. permit APPLICATION. AS A RESULT OF THIS NRMPLEX INDICATED IN AN 8/24/82 LETTER THAT THEY BELIEVE THEY ARE NOW A GENERATOR WITH SHORT TERM STORAGE. PLEASE PERFORM A SITE INSPECTION. YOUR REPORT SHOULD COVER THE AREAS ON THE ATTACHED SHEET. IF YOU HAVE ANY QUESTIONS CONCERNING THIS INSPECTION PLEASE CALL.

Comments

Completed by: Joe Sappia Date: 10/22/82 Supervisor: SKA
Initials

ATTACH PERTINENT DOCUMENTS AND ROUTE TO COMPLIANCE DIVISION AFTER COMPLETION

RP-12 (12/80)